

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT NEW YORK

In re:

SEARS HOLDING CORPORATION

Debtor,

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CHAPTER 11

Case No. 18-23538 (RDD)

(Jointly Administered)

Response to the Objection

Creditors Response to the Debtors' Thirty-Sixth Omnibus-Objection to Claims

The corporation known as Kingdom Seekers Inc., a religious organization and creditor of the two claims known as claim #26515 and #26517 (in the Sears Holdings Corporation Bankruptcy Case No. 18-23538) was formed to help assist and relieve Aron Goldberger /Odrica Harrow with recovery of business, and personal losses, along with damages from unpaid income assets. Presently Kingdom Seekers Inc. the existing creditor of this claim, and in dire need of the Section 503.(b)(9) admin priority opt-in percentage, to support the company administrative costs as the business bank accounts are now at risk, and action must be taken immediately to bring the accounts into good standing, as stated by its Federal Banking Institution. **(Exhibit A)**.

After several email and phone communications with, M3 Partners, who stated they would reconcile the issue **(Exhibit B)**, after speaking with the appointed trustee of the claim, Paul Schwartzberg, of D.O.J, he referred Sara Lynn Bruaner of Akin Gump Strauss Hauer & Feld, who stated there were no more funds available, and then soon after, speaking to Phillip C. Dublin by phone, who stated in the week of October 10th, 2021, he would follow up and communicate with the creditor, again by phone. Kingdom Seekers Inc. was left with no resolution, and only the objection notices, which we, the creditors are now responding to the objection, after no follow up communications promised by the debtors representatives, and provisions of evidence to the debtors teams, and attorneys, the creditor now questions the honesty and validity of those handling the fate of the creditors financial business matters, fate of receiving financial relief claims submitted. If it is true that there are no funds available, the creditor is requesting for that statement to be verified by the courts, to prevent prolonging use of resources and become more sustainable in business practices, instead of wasting time, energy and resources, for the better common good of all as a sustainable business. These

inconsistent, misleading communications are several reasons why the Disputed Claim should not be reclassified for the reasons set forth in the Objection, including the specific factual and legal basis upon which claimant completely relies on opposing this Objection. Kingdom Seekers Inc. is responding to this objection to seek out the truth of the matters from the court regarding claim amounts available to the creditor Kingdom Seekers Inc., to determine and communicate its own business financial position .

At the time of being in contact with the debtors attorneys, we, the creditors were requesting a Ballot ID# seeking exception to the rule of, enrolling and opting-in to the admin consent program, with the excuse of mail theft and losses, to Aron Goldberger, (see attached provided police reports (**Exhibit C.**)). Due to mail thefts at the time of the Bankruptcy Ballot deadline proceedings, in 2019. We, the creditors, were unable to enroll by the deadline. The mail thefts, delayed all mail notifications regarding this case, and have been ongoing since 2014, and continuing into, 2015, 2018, 2019 and even present day, as the sale of goods are corporate sales referrals, beneficial with ongoing continuous, long term financial business fruition, from the previous creditor /employee, known as Aron Goldberger/Odrica Harrow, to the Sears Holdings Corporation, to date.

The original creditor of this case Aron Goldberger did not receive court notices, and made notice of this case by self discovery, and late mail, in this year of 2021. Aron Goldberger has made provisions for Kingdom Seekers Inc. to work on behalf of the losses, due to not being compensated for sale of goods, which caused several hardships and losses of opportunity. Aron Goldberger is also known as Odrica Harrow and is listed as such, the employee in the spreadsheet for sale of goods, (please see attached court ordered name change, and employee sale of goods referral spreadsheet). Regarding the Sale of Goods for Sears Holdings Corporation Bankruptcy Case claim# 26517, employee. Aron Goldberger/ Odrica Harrow, previously referred to commercial appliance sale of goods, nationwide while being employed with Sears Holdings Corporation, in the Corporate Division, and has not been compensated for the sales of these goods, of Appliances, Mattresses and Electronics, (**Exhibit D**). In turn, we have been delayed in all 2019 Admin Consent Program enrollment opportunities, and have not received any ballot numbers, due to mail theft, delaying all claim, vote, and ballot opportunity. These types of claims of non-payment, have been mentioned in different cases with the previous creditor, Aron Goldberger. Exhibit D describes the basis for the amount of the Proof of Claim. The value amount of this Sears, Kmart claim #26517, is \$2,525,200.00. We the creditors filed this claim in accordance with the Bankruptcy Code, Section 503.(b)(9) admin priority for Kingdom Seekers Inc. we are concerned and obliged to know, a proximity date of completion of the reconciliation promised by the debtors, due to dire need commitments with financial institutions, and essential personal needs, domestic priorities, support to children, education and business administration expenses, immediately. The admin claims that fall under the Chapter 11 US Code Section 503.(b)(9); Admin Claim # 26517 from Kingdom Seekers Inc. do fall under the code of Section 503.(b)(9) admin priority percentage immediately, the 20-Day Goods Priority Claim Under Bankruptcy Code, with the exception of delays from stolen mail, and police reports,

previously sent, to support the company's claims for administrative costs. These are the second reasons why the Disputed Claim should not be reclassified for the reasons set forth in the Objection, including the specific factual and legal bases upon which claimant completely relies on opposing this Objection.

Regarding the Kmart Injury case Claim #26515 Asserted as a Priority in the amounts of \$5,531,000.00 was previously litigated in court as evident, and not paid out. According to Chapter 11 U.S. Code § 507 - Priorities, because the creditors business bank accounts are now at risk, and several domestic, personal, child expenses, employee salary for single corporate advisor expenses are in play, creditor is taking initiative and action in this Response to objection, to schedule payment for claims # 26517 under "11 U.S. Code § 507 - Priorities Bankruptcy Codes mentioned above as soon as possible. (a)The following expenses and claims have priority in the following order:(1)First:

(A)Allowed unsecured claims for domestic support obligations that, as of the date of the filing of the petition in a case under this title, are owed to or recoverable by a spouse, former spouse, or child of the debtor, or such child's parent, legal guardian, or responsible relative, without regard to whether the claim is filed by such person or is filed by a governmental unit on behalf of such person, on the condition that funds received under this paragraph by a governmental unit under this title after the date of the filing of the petition shall be applied and distributed in accordance with applicable nonbankruptcy law.

(B)Subject to claims under subparagraph (A), allowed unsecured claims for domestic support obligations that, as of the date of the filing of the petition, are assigned by a spouse, former spouse, child of the debtor, or such child's parent, legal guardian, or responsible relative to a governmental unit (unless such obligation is assigned voluntarily by the spouse, former spouse, child, parent, legal guardian, or responsible relative of the child for the purpose of collecting the debt) or are owed directly to or recoverable by a governmental unit under applicable nonbankruptcy law, on the condition that funds received under this paragraph by a governmental unit under this title after the date of the filing of the petition be applied and distributed in accordance with applicable nonbankruptcy law.

(C)If a trustee is appointed or elected under section 701, 702, 703, 1104, 1202, or 1302, the administrative expenses of the trustee allowed under paragraphs (1)(A), (2), and (6) of section 503(b) shall be paid before payment of claims under subparagraphs (A) and (B), to the extent that the trustee administers assets that are otherwise available for the payment of such claims.

(2)Second, administrative expenses allowed under section 503(b) of this title, unsecured claims of any Federal reserve bank related to loans made through programs or facilities authorized under section 13(3) of the Federal Reserve Act (12 U.S.C. 343),[1] and any fees and charges assessed against the estate under chapter 123 of title 28.

(3)Third, unsecured claims allowed under section 502(f) of this title.

(4)Fourth, allowed unsecured claims, but only to the extent of \$10,000 [2] for each individual or corporation, as the case may be, earned within 180 days before the date of the filing of the petition or the date of the cessation of the debtor's business, whichever occurs first, for—

(A)wages, salaries, or commissions, including vacation, severance, and sick leave pay earned by an individual; or

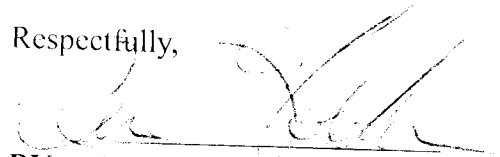
(B)sales commissions earned by an individual or by a corporation with only 1 employee, acting as an independent contractor in the sale of goods or services for the debtor in the ordinary course of the debtor's business if, and only if, during the 12 months preceding that date, at least 75 percent of the amount that the individual or corporation earned by acting as an independent contractor in the sale of goods or services was earned from the debtor.

(7)Seventh, allowed unsecured claims of individuals, to the extent of \$1,800 squared for each such individual, arising from the deposit, before the commencement of the case, of money in connection with the purchase, lease, or rental of property, or the purchase of services, for the personal, family, or household use of such individuals, that were not delivered or provided.

(9) Ninth, allowed unsecured claims based upon any commitment by the debtor to a Federal depository institutions regulatory agency (or predecessor to such agency) to maintain the capital of an insured depository institution." These reasons mentioned are the reason why the two Disputed Claim should not be reclassified for the reasons set forth in the Objection, including the specific factual and legal basis upon which claimant completely relies on opposing this Objection.

Dated: October 29th, 2021
Poughkeepsie, NY

Respectfully,



BY: Aron Goldberger, Pro-se

Kingdom Seekers Inc.

15 S Bridge Street, #312

Poughkeepsie, NY 12601

Ph and Fax# 845-471-2760

Exhibit A

1 page(s)



Hudson
CREDIT UNION

P.O. Box 1071 | Poughkeepsie, NY | 12602-1071
845.463.3011 | hvcu.org

168919-10.12 0 13970-1.1 1oz



KINGDOM SEEKERS INC
15 S BRIDGE ST APT 312
POUGHKEEPSIE, NY 12601-3578

10/07/2021

Knorr Claim # 26515
Bankruptcy Claim Pending

Dear Member:

Your HVCU checking account has been negative for at least 30 days. Due to the negative balance Privilege Pay is no longer available to you. If you do not make a deposit immediately HVCU will freeze all of your accounts, exercise its statutory lien rights, and close the checking account if the negative balance has not been cured.

If you are having difficulty managing your checking account contact BALANCE, a financial education and counseling service provided to you at no cost, at 1.888.456.2227.

If you have any questions please contact a member of the Collections Department at 845.463.3011 extension 3200 Monday through Thursday, 8 am to 7 pm, Friday 8am to 5pm or Saturday 8:30 am to 12:30 pm ET. You may disregard this letter if the negative balance in your checking account has been rectified since this letter was sent.

To the extent that the above-referenced indebtedness has been discharged, or is subject to an automatic stay of a bankruptcy order under Title 11 of the United States Code, then this notice is for compliance and informational purposes only and does not constitute a demand for payment or an attempt to collect any such obligation.

Thank you for your prompt attention to this matter.

Sincerely,

Collections Department

11 USCODE § 507 Priorities
(a)(9)

The following expenses and claims have priority in the following order:
(a)(1)(A) In an allowed unsecured claims based upon any commitment by the debtor to a Federal deposit institution's regulatory agency (or predecessor to such agency) to maintain the capital of an insured depository institution.

Exhibit B

5 page(s)

A handwritten signature in blue ink, appearing to read "C. [unclear]".



Aron Goldberger <kingdomseekersinc2020@gmail.com>

FW: [MACRO WARNING] Request for Ballot ID# for Late Enrollment into Admin Consent Program Opt-In (Kingdom Seeker)

5 messages

Sears AEC Ballot Settlement <searsaecballotsettlement@m3-partners.com>

To: "kingdomseekersinc2020@gmail.com" <kingdomseekersinc2020@gmail.com>

Tue, Sep 28, 2021 at 8:33 PM

Hi Aron,

Sears, Kmart and its affiliates will reconcile the claims that you or your firm filed in accordance with the Bankruptcy Code.

Unfortunately, we do not have a date when this will be completed by.

Best,
The Debtors



1700 Broadway – 19th
FL

New York, NY 10019

www.m3-partners.com

searsaecballotsettlement@m3-partners.com

Please note that we have moved to new offices and updated our contact information.

From: Aron Goldberger <kingdomseekersinc2020@gmail.com>

Sent: Tuesday, September 28, 2021 5:35 PM

To: Sears AEC Ballot Settlement <searsaecballotsettlement@m3-partners.com>; searsaecballotsettlement@m3-partners.com

Subject: [MACRO WARNING] Request for Ballot ID# for Late Enrollment into Admin Consent Program Opt-In

Attn. Restructuring Advisor,

The corporation known as Kingdom Seekers Inc., a religious organization and creditor of the claim known as claim #26517 (in the Sears Holdings Corporation Bankruptcy Case) was formed to help assist, Aron Goldberger/Odrica Harrow with recovery of business, and personal losses, along with damages from unpaid income assets. Presently Kingdom Seekers Inc. the existing creditor of this claim, is in dire need of the Section 503(b)(9) admin priority opt-in percentage, to support the company administrative costs as the business bank accounts are now at risk, and action must be taken within 14 business days.

Pg 9 of 22

We are requesting a Ballot ID# with exception to the rule to enroll and opt-in to the admin consent program today, with the excuse of mail theft and losses, to Aron Goldberger, (see attached provided police reports). Due to mail theft at the time of the Bankruptcy Ballot deadline proceedings, in 2019, we were unable to enroll by the deadline. The mail thefts, delayed all mail notifications regarding this case, and have been ongoing since 2014, and continuing into, 2015, 2018, 2019 and even present day, as the sale of goods are corporate sales referrals, beneficial with ongoing continuous, long term financial business fruition, from the previous creditor /employee, known as Aron Goldberger/Odrica Harrow, to the Sears Holdings Corporation. The original creditor of this case did not receive court notices, and made notice of this case by self discovery, and late mail, in this year of 2021. Aron Goldberger has made provisions for Kingdom Seekers Inc. to work on behalf of the losses, due to not being compensated for sale of goods, which caused several hardships and losses of opportunity. Aron Goldberger is also known as Odrica Harrow and is listed as such, the employee in the spreadsheet for sale of goods, (please see attached court ordered name change, and employee sale of goods referral spreadsheet).

Regarding the Sale of Goods for Sears Holdings Corporation Bankruptcy Case claim# 26517, employee. Aron Goldberger/Odrica Harrow, previously referred commercial appliance sale of goods, nationwide while being employed with Sears Holdings Corporation, to the Corporate Division, and has not been compensated for the sales of these goods. In turn, we have been delayed in all 2019 Admin Consent Program enrollment opportunities, and have not received any ballot numbers, due to mail theft, (see attached 2019 mail theft police reports) delaying all claim, vote, and ballot opportunity. These claims have been made mention of in a current directly related case pending with the NYS Department of Labor, and the U.S. Court of Federal Claims, regarding ongoing unpaid incomes, mail thefts and other matters.

After speaking to Mr. Victor Vazquez yesterday, who captured our company info and contact information, he directed us to your company email, in order to discuss obtaining a Ballot ID#, with the goal of Opting-into the admin consent program. He informed us, the deadline took place in 2019, and we requested escalation to have the exception approved with documents showing why an opportunity to opt-in late, should be considered, and is a dire need. We are contacting the restructuring advisors to get this approved. As a religious organization we have been instructed by God to contact this department, requesting this option from

10/29/21, 12:56 PM

Gmail - FW: [MACRO WARNING] Request for Ballot ID# for Late Enrollment into Admin Consent Program Op'n (Kingdom Seeker)
Your department, so we may meet our own business administrative financial account deadlines at risk, that must be met within 14 business days or less, to continue the work assigned to us by God.

Thank You,

Kingdom Seekers Inc./

Aron Goldberger

15 S Bridge Street, Suite 312

Poughkeepsie, NY 12601

Fax & Phone (845)-471-2760

kingdomseekersinc2020@gmail.com

This message contains information which may be confidential and privileged. Unless you are the intended addressee (or authorized to receive for the intended addressee), you may not use, copy or disclose to anyone the message or any information contained in the message. If you have received the message in error, please advise the sender by reply email or by calling 212-202-2200 and delete the message.

This message contains information which may be confidential and privileged. Unless you are the intended addressee (or authorized to receive for the intended addressee), you may not use, copy or disclose to anyone the message or any information contained in the message. If you have received the message in error, please advise the sender by reply email or by calling 212-202-2200 and delete the message.

6 attachments

2018 Police Report HP.jpeg
489K

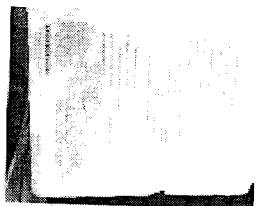
Q4 2021
Page 6 of 8

CHI Proof of lost and tampered mail.jpeg
418K

Mail Theft Awaiting Sears PaymentsDV2014.jpeg
535K


Name Change pg1.jpeg
490K

Name change page 2.jpeg



2406K

6/15/13
Pg 5 of 8

 **Sears Leads Odrica Harrow (2).xls**
57K

Aron Goldberger <kingdomseekersinc2020@gmail.com>
To: Sears AEC Ballot Settlement <searsaecballotsettlement@m3-partners.com>

Tue, Sep 28, 2021 at 10:38 PM

Thank you for your prompt follow up.

All The Best!

Aron

Kingdom Seekers Inc./

Aron Goldberger

15 S Bridge Street, Suite 312

Poughkeepsie, NY 12601

Fax & Phone (845)-471-2760

kingdomseekersinc2020@gmail.com

[Quoted text hidden]

Aron Goldberger <kingdomseekersinc2020@gmail.com>
To: Sears AEC Ballot Settlement <searsaecballotsettlement@m3-partners.com>

Tue, Oct 12, 2021 at 5:33 PM

To whom it may concern,

May I please have an update status, on case claim# 26517, regarding ballot id# request, to make the application of Section 503.(b)(9) admin priority opt-in percentage claim?

All The Best,

Aron

Kingdom Seekers Inc./

Aron Goldberger

15 S Bridge Street, Suite 312

Poughkeepsie, NY 12601

Fax & Phone (845)-471-2760

kingdomseekersinc2020@gmail.com

[Quoted text hidden]

See below
to 6 of 8

Sears AEC Ballot Settlement <searsaecballotsettlement@m3-partners.com>
To: Aron Goldberger <kingdomseekersinc2020@gmail.com>

Tue, Oct 12, 2021 at 11:22 PM

[Quoted text hidden]

Aron Goldberger <kingdomseekersinc2020@gmail.com>
To: garrett.fai@weil.com
Bcc: sbrauner@akingump.com

Fri, Oct 15, 2021 at 3:37 PM

Pg 13 of 22

Dear Mr Fail,

Please see communication and attachments mentioned in the previous email I sent you, to help assist with Administrative Priority Claim payment approvals.
Best!

Kingdom Seekers Inc./

Aron Goldberger

15 S Bridge Street, Suite 312

Poughkeepsie, NY 12601

Fax & Phone (845)-471-2760

kingdomseekersinc2020@gmail.com

10/29/21, 12:56 PM

Gmail - FW: [MACRO WARNING] Request for Ballot ID# for Late Enrollment into Admin Consent Program Opt-In (Kingdom Seeker)

[Quoted text hidden]

6 attachments

2018 Police Report
10/18

2018 Police Report HP.jpeg
489K

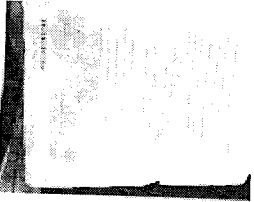
CHI Proof of lost and tampered mail.jpeg
418K

Mail Theft Awaiting Sears PaymentsDV2014.jpeg
535K

Name Change pg1.jpeg
490K

Gmail - FW: [MACRO WARNING] Request for Ballot ID# for Late Enrollment into Admin Consent Program Opt-in (Kingdom Seeker)

schubert
8/8



Name change page 2.jpeg
2406K



Sears Leads Odrica Harrow (2).xls
57K

Exhibit C

3 page(s)

Genus + C. lat. spec.



Dana Schmidein
Case Manager

COMMUNITY HOUSING INNOVATIONS, INC.

2 Linden Lane (Rt. 9), NYDE PARK, NY 12538
PHONE: 845-229-9066 FAX: 845-229-9072
dschmidein@communityhousing.org

To whom it may concern:

February 13, 2019

Avon Goldberger was admitted to our program on December 26, 2018. When she arrived she stated she had been having issues with her mail. I advised her to speak with the post office. She stated she has been in contact multiple times with the post office. The first three weeks she was here she did not receive many pieces of mail, and two of the pieces that had been forwarded from a previous address were opened when they arrived. Avon stated she has tried to mail herself stuff and is not receiving her mail. I again advised her to speak with the Postmaster at the post office. All the mail that has come recently has not been opened.

If you have any question regarding this issue please feel free to contact me at 845-229-9069. I am in the office Monday to Friday from 8am to 4pm.

Sincerely,

Dana Schmidein

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[illegible]

RESULTS

Example 4: 30/3 pages

Exhibit D

2 page(s)

[illegible]

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